



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street, 3<sup>rd</sup> Floor  
New York, New York 10007

July 20, 2021

By ECF and Email

(CronanNYSDChambers@nysd.uscourts.gov)

Hon. John P. Cronan

United States District Court

Southern District of New York

500 Pearl Street, Courtroom 12D

New York, NY 10007

Re: *W.P.V., on his own behalf and on behalf of his minor child, W.P.O. v. U.S., et al.*  
No. 21 Civ. 4436 (JPC)

Dear Judge Cronan:

This Office represents the government in the above-captioned action. The government writes to respectfully request a 60-day stay of this matter to September 20, 2021. The stay is requested to allow the parties time to engage in settlement discussions. The United States, along with a group of counsel who are coordinating negotiations on behalf of plaintiffs and claimants, are engaged in a nationwide effort to settle district court cases and pending administrative tort claims arising from family separations at the U.S./Mexico border that occurred during the prior administration. While significant progress has been made, due to the scale and complexity of the effort, additional time is needed to achieve a global resolution of these matters. Plaintiffs join the government's request for a 60-day stay. The parties respectfully request that they provide the Court with a status update by September 20, 2021.

For the same reasons as listed above, the government also respectfully requests that the Court adjourn the Initial Pretrial Conference that is currently scheduled for August 3, 2021 at 10:00 a.m. *sine die*. Plaintiffs consent to this request.

I thank the Court for its consideration of these requests.

Sincerely,

AUDREY STRAUSS

United States Attorney for the  
Southern District of New York

By: /s/ Rebecca R. Friedman

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